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ROGER P. McTIERNAN, JR. (RPM 1680)
BARRY, McTIERNAN & MOORE
2 Rector Street – 14th Floor
New York, New York 10006
(212) 313-3600

Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

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SEGUNDO VILLARROEL AND MARTHA L.
VILLARROEL,

**NOTICE OF
ADOPTION**

Plaintiffs,

07 CV 01546

-against-

120 LIBERTY STREET LLC, 233 BROADWAY
OWNERS, LLC, 59 MAIDEN LANE ASSOCIATES,
LLC, 75 BROAD LLC, AJ GOLDSTEIN & CO., ALAN
KASMAN DBA KASCO, ALAN L. MERRIL, ANN
TAYLOR STORES CORPORATION, BANKERS
TRUST COMPANY, BATTERY PARK CITY
AUTHORITY, BETTY JEAN GRANQUIST, BFP ONE
LIBERTY PLAZA CO., LLC, BLACKMON-
MOORING-STEAMATIC CATASTROPHE, INC.
D/B/A BMS CAT, BOARD OF EDUCATION FO THE
CITY OF NEW YORK, BROOKFIELD FINANCIAL
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, LP, BROOKFIELD PARTNERS, LP,
BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDINGS INC., BT
PRIVATE CLIENTS CORP., CAROL GAYNOR
TRUST, CAROL GAYNOR, AS TRUSTEE OF THE
CAROL GAYNOR TRUST, CAROL MERRIL
GAYNOR, DEPARTMENT OF BUSINESS SERVICES,
DEUTSCHE BANK TRUST COMPANY, DEUTSCHE
BANK TRUST COMPANY AMERICAS, DEUTSCHE
BANK TRUST CORPORATION, ENVIROTECH
CLEAN AIR, INC., FRED GOLDSTEIN, GENERAL RE

SERVICES CORP., GPS ENVIRONMENTAL
CONSULTANTS, INC., HARLAND GAYNOR, AS
TRUSTEE UNDER A DECLARATION OF TRUST,
HAROLD G. GOLDSTEIN, AS TRUSTEE UNDER A
DECLARATION OF TRUST, HERMAN L. BLUM, AS
TRUSTEE UNDER THE LAST WILL AND
TESTAMENT OF LOUIS W. GOLDSTEIN, HILLMAN
ENVIRONMENTAL GROUP, LLC, IDELL
GOLDSTEIN, AS TRUSTEE UNDER DECLARATION
OF TRUST, INDOOR ENVIRONMENTAL
TECHNOLOGY, INC., JEMB REALTY CORP.,
KASCO RESTORATION SERVICES CO.,
MARGARET G. WATERS, MARGUERITE K. LEWIS,
AS TRUSTEE UNDER THE LAST WILL AND
TESTAMENT OF LOUIS W. GOLDSTEIN,
MATTHEW A. GELBIN, AS TRUSTEE OF THE
GELBIN FAMILY, MERRILL LYNCH & CO, INC.,
NATALIE S. LEBOW, AS TRUSTEE OF THE
JEREMIAH PHILIP LEBOW REVOCABLE TRUST,
NATALIE S. LEBOW, AS TRUSTEE OF THE JERRY
P. LEBOW FAMILY TRUST, NATIONAL
ASSOCIATION OF SECURITIES DEALERS, INC.,
NEW LIBERTY PLAZA LP, NEW YORK CITY
INDUSTRIAL DEVELOPMENT AGENCY, NEW
YORK CITY INDUSTRIAL DEVELOPMENT
CORPORATION, NOMURA HOLDING AMERICA,
INC., NOMURA SECURITIES INTERNATIONAL,
INC., ONE LIBERTY PLAZA, PAMELA BETH KLEIN,
AS TRUSTEE OF THE PAMELA AND ROWAN
KLEIN TRUST, ROWAN K. KLEIN, AS TRUSTEE OF
THE PAMELA AND ROWAN KLEIN TRUST, RUTH
G. LEBOW, SHIRLEY G. SHOCKLEY, AS TRUSTEE
UNDER DECLARATION OF TRUST, STRUCTURE
TONE (UK), INC., STRUCTURE TONE GLOBAL
SERVICES, INC., SYLVIA R. GOLDSTEIN, THE
BOARD OF MANAGERS OF THE ONE LIBERTY
PLAZA CONDOMINIUM (CONDO #1178), THE CITY
UNIVERSITY OF NEW YORK, THE NEW YORK
CITY SCHOOL CONSTRUCTION AUTHORITY, THE
ONE LIBERTY PLAZA CONDOMINIUM (CONDO
#1178), TISHMAN INTERIORS CORPORATION,
TOSCORP INC., TRIBECA LANDING L.L.C.,
TUCKER ANTHONY, INC., TULLY CONSTRUCTION
CO., INC., TULLY INDUSTRIES, INC., WESTON
SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO.,
L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP.,

WFP TOWER A CO., WFP TOWER A CO. G.P. CORP.,
WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P.
CORP., WFP TOWER B HOLDING CO., LP, WFP
TOWER B. CO., L.P., AND WORLD FINANCIAL
PROPERTIES, L.P., ET AL.,

Defendants.

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PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a
STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES,
INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations
set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master
Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's
Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In
Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does
not comprehensively address any of the specific allegations within the Check-Off
Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or
information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK),
INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment
dismissing the above-captioned action as against it, together with its costs and
disbursements.

Dated: New York, New York
August 18, 2008


ROGER P. McTIERNAN, JR. (RPM 1680)
BARRY, McTIERNAN & MOORE
Attorneys for Defendants
STRUCTURE TONE, INC. s/h/a
STRUCTURE TONE (UK), INC. and
STRUCTURE TONE GLOBAL SERVICES, INC.
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New York, New York 10006
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